

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et al.*,

Debtors.<sup>1</sup>

PROMESA

Title III

No. 17 BK 3283-LTS

(Jointly Administered)

**This filing relates to ERS.**

**NOTICE OF FILING AND CORRESPONDING CERTIFICATION REGARDING  
TWENTY-NINTH OMNIBUS OBJECTION (NON-SUBSTANTIVE) OF THE  
EMPLOYEE RETIREMENT SYSTEM OF THE GOVERNMENT OF THE  
COMMONWEALTH OF PUERTO RICO TO EXACT DUPLICATE CLAIMS**

The Employee Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”), by and through the Financial Oversight and Management Board for Puerto Rico (the “Oversight Board”), as the representative of ERS pursuant to Section 315(b) of the *Puerto Rico Oversight, Management, and Economic Stability Act* (“PROMESA”),<sup>2</sup> files this certification regarding the *Twenty-Ninth Omnibus Objection (Non-Substantive) of the Employee Retirement System of the Government of the Commonwealth of Puerto Rico to Exact Duplicate Claims* (ECF

---

<sup>1</sup> The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (the “Commonwealth”) (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); and (v) Puerto Rico Electric Power Authority (“PREPA” and together with the Commonwealth, COFINA, HTA, and ERS, the “Debtors”) (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

<sup>2</sup> PROMESA is codified at 48 U.S.C. §§ 2101-2241.

No. 6278) (the “Twenty-Ninth Omnibus Objection”) to the exact duplicate proofs of claim listed on Exhibit A thereto.

ERS, through its advisors, has conducted a comprehensive re-review of each claim subject to the Twenty-Ninth Omnibus Objection. Each of the Claims to Be Disallowed<sup>3</sup> by the Twenty-Ninth Omnibus Objection were reviewed by two different sets of reviewers to confirm that they were exact duplicates of the corresponding Remaining Claim, as identified in the Twenty-Ninth Omnibus Objection. Based upon such review, ERS (a) hereby withdraws its objections as to Proofs of Claim Nos. 10942, 20931, 74098, 111826, 131239, 131992, 133210, 160502 and (b) certifies that each of the Claims to Be Disallowed, as identified in the revised proposed order granting the Twenty-Ninth Omnibus Objection attached hereto as Attachment 1, and the accompanying schedule of claims attached thereto as Exhibit A, are, in fact, exact duplicates of the corresponding Remaining Claim.

*[Remainder of Page Intentionally Left Blank]*

---

<sup>3</sup> Capitalized terms not defined herein shall have the meanings set forth in the Twenty-Ninth Omnibus Objection.

Dated: July 18, 2019  
San Juan, Puerto Rico

Respectfully submitted,

/s/ Hermann D. Bauer

Hermann D. Bauer  
USDC No. 215205  
Carla García Benítez  
USDC No. 203708  
**O'NEILL & BORGES LLC**  
250 Muñoz Rivera Ave., Suite 800  
San Juan, PR 00918-1813  
Tel: (787) 764-8181  
Fax: (787) 753-8944

*Attorneys for the Financial  
Oversight and Management Board,  
as representative for ERS*

/s/ Martin J. Bienenstock

Martin J. Bienenstock (*pro hac vice*)  
Brian S. Rosen (*pro hac vice*)  
**PROSKAUER ROSE LLP**  
Eleven Times Square  
New York, NY 10036  
Tel: (212) 969-3000  
Fax: (212) 969-2900

*Co-Attorneys for the Financial  
Oversight and Management Board  
as representative for ERS*